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1 David N. Chandler, Sr.
                            SBN 60780
   David N. Chandler, Jr.
                            SBN 235427
   DAVID N. CHANDLER, p.c.
   1747 Fourth Street
  Santa Rosa, CA
                   95404
   Telephone: (707) 528-4331
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   Attorneys for Debtor
5
                     UNITED STATES BANKRUPTCY COURT
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7
                    NORTHERN DISTRICT OF CALIFORNIA
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   IN RE:
                                 CASE No. 10-11533
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   NAVJOT, LLC,
                                 CHAPTER 11
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        DEBTOR.
                                 APPLICATION FOR ORDER AUTHORIZING
                                 EMPLOYMENT OF SPECIAL COUNSEL;
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                                 DECLARATION OF ALBERT E. CORDOVA;
                                 DECLARATION OF DAVID N. CHANDLER
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        The Application of Navjot, LLC, Debtor herein, respectfully
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   represents:
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        1.
             The within case was filed under Chapter 11 of the
   Bankruptcy Code.
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             Applicant requires the assistance of counsel who has some
   expertise in Civil Litigation matters,
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                                               and
                                                   is knowledgeable
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   regarding the claims against Kirt Menon and the Counter Claims of
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  Mr. Menon.
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        3.
            Attorney Albert E. Cordova is already familiar with many
   aspects of the relationship between Kirt Menon and the Debtor.
  is in the interest of the estate to utilize that knowledge and
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   maintain the momentum in the matter.
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Offices of Albert E. Cordova, 1101 Fifth Avenue, Suite 200, San

Rafael, CA 94901 and desire to retain Mr. Cordova and his firm as

special counsel for the limited purpose of representing Debtor and

Applicant has consulted with Albert E. Cordova,

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1 assisting general counsel for Debtor as regards claims and counter 2 claims of Kirt Menon.

- 5. The Debtor desires to retain and employ the Law Offices of Albert E. Cordova to render such advice and perform such services as are required at the direction of general counsel and which desirable and necessary in the administration of this estate.
 - 6. The hourly rate for Albert E. Cordova is \$325.00.
- 7. Albert E. Cordova has indicated his willingness to act at the direction of general counsel.
- 8. To the best of Applicant's knowledge, Albert E. Cordova, Law Offices of Albert E. Cordova does not have any connection with the Debtor, the creditors, or any other party in interest, or their respective attorneys or accountants, the United States Trustee or any person employed in the office of the United States Trustee, and represents no interest adverse to the estate in the matters upon which he is to be retained, except as represented in the Declaration of Albert E. Cordova.

WHEREFORE, it is respectfully requested that Debtor be authorized to employ Albert E. Cordova, Law Offices of Albert E. Cordova, under a general retainer fee agreement based upon applicable hourly rates, to provide such advice and counsel as special counsel in the aforementioned action, on the terms and restrictions set forth above.

25 Dated: 8/17/10 DAVID N. CHANDLER, p.c.

By: /s/ David N. Chandler
DAVID N. CHANDLER,
Attorney for Debtors

DECLARATION OF ALBERT E. CORDOVA

- I, Albert E. Cordova, declare and say:
- That if called as a witness, I am competent to testify to the within matters from my own knowledge.
- That I have been asked to provide advice and counsel to the Debtors through David N. Chandler, p.c., their general counsel concerning claims against and counter claim of Kurt Menon relating to the within matter.
 - My hourly rate is \$325.00.
- I have no connection with the bankruptcy estate, its creditors, anyone employed by the Office of the U.S. Trustee, or counsel for any of the parties in interest, except I had previously represented Debtor and Mr. Sroa, it's managing member, in the matter of Branscomb v. Menon, et al., pending in Marin County, the claims therein being the subject of this Special Counsel Application. I am currently owed \$7,500.00 for the prior representation. Otherwise, I am a disinterested person under Section 327 of the Code.
- 5. I am willing to be employed as special counsel on a 19 general retainer basis at the hourly rates set forth above.

Executed under penalty of perjury this 17th day of July, 2010 at San Rafael, California.

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<u>/s/ Albert E. Cordova</u>

DECLARATION OF DAVID N. CHANDLER

- 25 I, David N. Chandler, declare and say:
- 26 That if called as a witness, I am competent to testify to 27 the within matters from my own knowledge.
 - That I am general counsel for the Debtor herein.

- That certain issues require the assistance of special 3. 2 counsel in areas in which I have little foreknowledge. counsel must be consulted with to identify and potentially resolve effectively.
 - The Debtor has consulted with Albert E. Cordova, Law 4. Offices of Albert E. Cordova, and desires to retain Mr. Cordova as special counsel in the case to consult with me regarding certain civil litigation issues related to the within case.
- 5. I have spoken with Mr. Cordova and have not been able to identify any connections with the estate, the debtor or creditors other than those identified in his Declaration. He appears to be 12 disinterested.

Executed under penalty of perjury this 17^{TH} day of August, 2010 at Santa Rosa, California.

> <u>/s/David N. Chandler</u> David N. Chandler

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